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Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to supplement the record with respect to Plaintiffs’ request for a case management conference to seek an extension of the fact discovery period. ECF No. 6829.

On May 30, 2020, Plaintiffs completed their disclosure of declarations that they intend to submit from non-party witnesses. Following our review of those declarations, Saudi Arabia has informed Plaintiffs that it will take depositions of only three non-party declarants: Kaysan Morgan, Samuel Coombs, and Usman Madha. Counsel for those witnesses have accepted service of subpoenas, and those depositions are scheduled for June 21, 22, and 24 respectively. Saudi Arabia will not depose the other seven non-party witnesses who have submitted declarations: Dieter Snell, Danny Gonzalez, Efrain Vazquez, Amy McCann, Holly Ratchford, and Judith and Ed Chmielewski.

The fact that these depositions have been taken off calendar provides further reason to deny Plaintiffs’ request for a case management conference as well as their request to extend the fact discovery period beyond June 30, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia